



John T. Seybert
(212) 898-4028
john.seybert@sedgwicklaw.com

December 9, 2015

Via ECF & Email

Hon. Edgardo Ramos, U.S.D.J.
United States District Court For
The Southern District of New York
United States Courthouse
40 Foley Square, Courtroom 619
New York, NY 10007

Re: *Mbody Minimally Invasive Surgery, P.C. v. UnitedHealthCare Insurance Company, et al.*
Civ. Act. No.: 14-cv-2495
Sedgwick File No.: 03246-000239

Dear Judge Ramos:

This office represents Defendants. We write to respectfully request a one-week extension of the time for Defendants to file their motion to dismiss from December 11, 2015 to December 18, 2015. We have been engaged in responding to a motion for a temporary restraining order and preliminary injunction brought by order to show cause in an unrelated matter. It has caused delays in preparing the motion to dismiss. A hearing on the order to show cause was initially scheduled for yesterday afternoon, but was adjourned yesterday to Friday, December 11, 2015, which substantially affects our ability to complete the motion and file it on Friday.

Plaintiffs' counsel consents to the request, which is the first request for an extension of time. We are submitting to the orders and judgment clerk via email a stipulation and proposed revised scheduling order for the motion to dismiss, which addresses the changes in the previously issued briefing schedule.

Thank you for your consideration of this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "John T. Seybert", with a stylized flourish at the end.

John T. Seybert
Sedgwick LLP

cc: Plaintiffs' counsel (via email)